

18 MAG 8840

Approved by: DAVID PRESLEY
Special Assistant United States Attorney

Before: THE HONORABLE MARTIN R. GOLDBERG
United States Magistrate Judge
Southern District of New York

 ORIGINAL

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UNITED STATES OF AMERICA	:	MISDEMEANOR
	:	<u>COMPLAINT</u>
-v-	:	Violation of
	:	NYVATL 511(1) (a)
ASHLEY M. JEFFERSON	:	
Defendant	:	COUNTY OF OFFENSE:
	:	ORANGE
- - - - -	-X	

SOUTHERN DISTRICT OF NEW YORK, ss.:

BRAHIM ELIDRISSI, being duly sworn, deposes and says that he is a Court Liaison, assigned to the United States Military Academy, West Point, New York, and charges as follows:

COUNT ONE


On or about September 6, 2018, at the United States Military Academy, West Point, New York, within the special maritime and territorial jurisdiction of the United States, in the Southern District of New York, ASHLEY JEFFERSON, the defendant, unlawfully, knowingly and willfully operated a motor vehicle upon a public road while knowing, or having reason to know, that her license to operate such motor vehicle in New York was suspended, revoked, or otherwise withdrawn by the commissioner, to wit, the defendant was observed operating her motor vehicle at Washington Gate and an investigation revealed that the defendant's state driver's license had been suspended.

(New York Vehicle and Traffic Law, Section 511(1) (a))

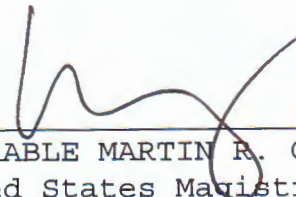
The basis for the deponent's knowledge and for the foregoing charges are, in part, as follows:

1. I am a Court Liaison, assigned to the Provost Marshal Office, at the United States Military Academy, West Point, New York, which is located in the Southern District of New York.
2. On or about September 6, 2018 at approximately 12:31 p.m., MP Officer, SPC Olson, was conducting Random Anti-Terrorism Measures (RAMS) at Washington Gate, when the defendant's vehicle was selected for a random search.
3. SPC Olson made contact with the driver, the defendant, and conducted a check of her driver's license and the results came back that the license was suspended.
4. The defendant was issued a District Court Violation Notice for operating a motor vehicle while license suspended or revoked (DCVN number 7553156/SY10).

WHEREFORE, deponent prays that the above-named defendant be imprisoned or bailed, as the case may be.


BRAHIM ELIDRISSI
Court Liaison

Sworn to before me this
17th day of October, 2018


HONORABLE MARTIN R. GOLDBERG
United States Magistrate Judge
Southern District of New York